

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE ELEVATOR AND ESCALATOR	:	MDL No. 1644
ANTITRUST LITIGATION	:	
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IN RE ELEVATOR ANTITRUST	:	Master Docket No. 1:04 CV 01178 (TPG)
LITIGATION	:	(ECF CASE)
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This Document Relates To:	:	
	:	
All Actions	:	<b>ORAL ARGUMENT REQUESTED</b>
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**DECLARATION OF LEAH BRANNON**

Pursuant to 28 U.S.C. § 1746, Leah Brannon declares as follows:

1. I am an associate of the law firm of Cleary Gottlieb Steen & Hamilton LLP, counsel for defendants United Technologies Corporation and Otis Elevator Company. I am admitted *pro hac vice* in the above referenced matter.
2. I submit this Declaration in support of the Defendants' Motion to Dismiss and to put before the Court certain documents cited in the defendants' papers.

3. I attach a true and correct copy of the following documents as Exhibits A, B, C, D, E, and F:

<u>Exhibit</u>	<u>Document</u>
A	Second Consolidated Amended Complaint, dated July 19, 2005
B	First Consolidated Amended Complaint, dated November 1, 2004
C	Transcript of January 13, 2005 Conference before the Hon. Thomas P. Griesa
D	Trib. Ammin. Reg. Lazio, sez. I, 21 Feb. 2001, No. 1371/2001 (Judgment No. 1371/2001 of the Regional Administrative Court of Lazio, Section 1, Feb. 21, 2001)
E	Certified Translation of Trib. Ammin. Reg. Lazio, sez. I, 21 Feb. 2001, No. 1371/2001 (Judgment No. 1371/2001 of the Regional Administrative Court of Lazio, Section 1, Feb. 21, 2001)
F	Workshop on Use of Elevators in Fires and Other Emergencies, March 2-4, 2004, Atlanta, Georgia, <i>available at</i> <a href="http://www.asme.org/cns/elevators/index.shtml">http://www.asme.org/cns/elevators/index.shtml</a> .

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 21, 2005 in Washington, D.C.



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LEAH BRANNON